

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : **CHAPTER 13**
Nicholas B. DeWald :
Debtor : **BANKRUPTCY NO.: 18-10769-mdc**

RESPONSE TO MOTION FOR RELIEF

Debtor, by his attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

1. Admitted.
2. Admitted.
3. Denied. The averments set forth in this Paragraph is denied to the extent that they contain conclusions of law to which no response is necessary. Additionally, Movant's averment contains factual allegation contained in documents on record before the Court, to which the Debtor cannot authenticate nor attest to the veracity thereof, thus those averments are denied.
4. Admitted.
5. Admitted.
6. Denied. The Debtor intends to cure any amounts that may be in arrears.
7. Denied.
8. Denied. Denied. The Debtor intends to cure any amounts that may be in arrears.
9. Denied. The averments set forth in this Paragraph is denied to the extent that they contain conclusions of law to which no response is necessary
10. Denied.

WHEREFORE, Debtor pray that the Movant's request for relief be denied.

Respectfully submitted,

Date: 9/8/2020

/s/ Brandon J. Perloff
Brandon J. Perloff Esquire.
Attorney for Debtor